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April 26, 1996

VIA HAND DELIVERY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W. - Room 222
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

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Re: ET Docket No. 96-35

Dear Mr. Caton:

On behalf of the INNOVA Corporation ("INNOVA"), we are filing an original and four (4) copies of its Comments in the above-referenced proceeding.

If there are any questions, do not hesitate to contact the undersigned.

Respectfully submitted,

FLETCHER, HEALD & HILDRETH, P.L.C.

Leonard Robert Raish

Leonard Robert Raish
Counsel for INNOVA Corporation

LRR:cej
Enclosures

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BEFORE THE

Federal Communications Commission

WASHINGTON, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)

Amendment of Parts 74, 78, and 101)
of the Commission's Rules to Adopt)
More Flexible Standards for Directional)
Microwave Antennas)

ET Docket No. 96-35

To: The Commission

COMMENTS OF INNOVA CORPORATION

Pursuant to Section 1.415 of the Commission's Rules,¹ INNOVA Corporation ("INNOVA") hereby comments on the above-captioned Notice of Proposed Rule Making ("NPRM"), which proposes modification of the FCC's point-to-point microwave rules.²

I. GENERAL

INNOVA is a State of Washington corporation with its headquarters located in Seattle, Washington. It is a leading manufacturer of microwave systems used in wireless networks. Its products are sold in both U.S. domestic markets and overseas.

II. BACKGROUND

Currently the FCC limits beamwidth of fixed point-to-point links by specifying mandatory minimum acceptable antenna gain requirements (NPRM at para. 2). In the NPRM (at para. 4), the FCC states, "recent technological developments have made alternative directional antenna designs available." The current Rules need to be modified to accommodate these

¹47 C.F.R. Section 1.415 (1996).

²NPRM at para. 1.

alternative antenna designs and have prompted this proceeding.

III. COMMENT

INNOVA proposes a modification to the maximum beamwidth and/or the minimum gain requirement proposed by the Commission for the specific range of 37.0 to 40.0 GHz as follows:

Frequency (MHz)	Category	Max. Beamwidth to 3dB Points (degrees)	Minimum Antenna Gain (dBi)
37,000-40,000	A	2.7	36
37,000-40,000	B	2.7	36

The modification proposed above will support the development of very small, unobtrusive, lightweight, easy-to-install and low-cost antennas for short-range micro-cell connections. These antennas could be deployed in PCS or wireless local telephony systems where ease of installation is paramount. INNOVA and other equipment manufacturers have made significant investments in the development of such specialized antennas for these applications, and demand for such equipment is likely to increase as PCS and other wireless technologies proliferate.

Modifying the Commission's proposed rule changes as shown above would allow for present as well as future technological advances in this arena, thereby allowing PCS and wireless local telephony operators to benefit from this technology. The modification herein proposed will further serve the public interest, and the goal of this proceeding, by maximizing spectrum efficiency, minimizing interference, and making the Commission's fixed serve microwave rules more compatible with new, emerging technologies. NPRM at paras. 1, 2, and 9.

WHEREFORE, INNOVA CORPORATION supports adoption of the Commission's proposed rules, as revised to reflect the modification described above.

Respectfully submitted,

INNOVA CORPORATION

By: 
Leonard Robert Raish

Its Attorney

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